

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

THABICO COMPANY

Plaintiff

v.

KIEWIT OFFSHORE SERVICES, LTD,
CMF LEASING CO., and B.R. CRANE
& EQUIPMENT LLC,

Defendants

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Civil Action No. 2:16-CV-00427

MOTION FOR LEAVE
TO FILE OPPOSITON TO MOTION TO ALLOCATE SANCTIONS

TO THE HONORABLE UNITED STATES DISTRICT COURT:

1. Michael A. Lee and Eric Fryar, (collectively, “Counsel”) file this Motion for Leave to File Opposition to Thabico’s Motion for Allocation of Sanctions, and respectfully submit the following:

2. The Court set a deadline for Michael A. Lee and Eric Fryar, Counsel for Thabico in this matter, to submit their Response to Thabico’s Motion to Allocate, Doc # 52. Counsel requests leave to file its motion approximately 6 hours late.

3. The reason for this delay is that Mr. Lee calendared the response due this Friday, November 10, 2017, instead of Thursday November 9, 2017. I sincerely apologize for any inconvenience this may have caused the Court or clerk’s office.

4. Given the early hour I have not been able to determine whether Thabico and its new counsel object to this request for leave to file 6 hours late. I will therefore submit this Motion as opposed and correct that status as necessary later today when I hear from my colleague representing Thabico. This Motion is not submitted to cause delay, but to ensure that justice may be done.

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Respectfully Submitted,

/s/ MICHAEL A. LEE
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CERTIFICATE OF SERVICE

I hereby certify that on Friday, November 10, 2017 a true correct copy of Thabico's Motion for Leave was forwarded to all Counsel of Record via the ECF electronic service system.
